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*Attorneys for Defendants Thomson Reuters Corporation,  
Thomson Reuters Holdings Inc., Thomson Reuters Canada  
Limited, and Thomson Reuters Applications Inc.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY	:	CIVIL ACTION
CORPORATION, et al.,	:	
	:	NO. 2:24-CV-04269
<i>Plaintiffs</i>	:	
	:	
v.	:	
	:	
THOMSON REUTERS	:	
CORPORATION, et al.,	:	
	:	
<i>Defendants</i>	:	

**NOTICE OF MOTION FOR RECONSIDERATION OF  
ORDER GRANTING PLAINTIFFS' MOTION TO REMAND**

**PLEASE TAKE NOTICE** that pursuant to Local Civil Rule 7.1(i) and in accordance with the Court's Order entered on November 21, 2024, the undersigned attorneys for Defendants Thomson Reuters Corporation, Thomson Reuters Holdings Inc., Thomson Reuters Canada Limited, and Thomson Reuters

Applications Inc. hereby move before the Honorable Harvey Bartle III, U.S.D.J., for reconsideration of the Order dated November 20, 2024 remanding this action to the Superior Court of the State of New Jersey (the “Remand Order”) and for an Order vacating the Remand Order in this action, denying Plaintiffs’ Motion to Remand this action, and dismissing Thomson Reuters Holdings Inc. and Thomson Reuters Applications Inc. from this action.

**PLEASE TAKE FURTHER NOTICE** that in support of this Motion, Defendants shall rely on the attached Brief.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is submitted herewith.

Dated: December 2, 2024

BALLARD SPAHR LLP

/s/ Marcel S. Pratt  
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**CERTIFICATE OF SERVICE**

I, Marcel S. Pratt, hereby certify that I caused a copy of the foregoing Notice of Motion for Reconsideration of Order Granting Plaintiffs' Motion for Remand, as well as the accompanying Brief in Support of the Motion and Proposed Order, to be served via e-filing on December 2, 2024 to all counsel of record.

Date: December 2, 2024

/s/ Marcel S. Pratt  
Marcel S. Pratt